

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GROWBLOX SCIENCES, INC.,

Docket No. 14 Civ. 2280 (ER)

Plaintiff,

-against-

GCM ADMINISTRATIVE SERVICES, LLC,  
SETH M. LUKASH, GARY HERMAN, and  
STRATEGIC TURNAROUND EQUITY  
PARTNERS, L.P. (CAYMAN)

Defendants.

**NOTICE OF MOTION FOR LEAVE  
TO SERVE AND FILE SECOND  
AMENDED COUNTERCLAIMS**

DIGITAL CREATIVE DEVELOPMENT  
CORPORATION, GCM ADMINISTRATIVE  
SERVICES, LLC, STRATEGIC TURNAROUND  
EQUITY PARTNERS, L.P. (CAYMAN),  
SETH M. LUKASH, and GARY HERMAN,

Counterclaimants,

-against-

GROWBLOX SCIENCES, INC., TODD DENKIN,  
JOSEPH J. BIANCO, TUMBLEWEED  
HOLDINGS, INC. f/k/a GROWOPP HOLDINGS,  
INC., CRAIG ELLINS, and GROWOPP, LLC,

Counterclaim-Defendants.

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, the accompanying Declaration of Thomas J. Fleming dated July 1, 2015, and upon all pleadings and proceedings had herein, Counterclaimants Digital Creative Development Corporation, GCM Administrative Services, LLC, Strategic Turnaround Equity Partners, LP (Cayman), Seth M. Lukash and Gary Herman will move this Court before the Honorable Edgardo Ramos, United States District Judge, at the United States Courthouse located at 40 Foley Square, New York,

New York 10005, Courtroom 619, on a date and time to be set by the Court, for an Order, pursuant to Federal Rule of Civil Procedure 15(a), for leave to serve and file the proposed Second Amended Counterclaims, and for such other and further relief as the Court deems just and proper.

Dated: New York, New York  
July 1, 2015

OLSHAN FROME WOLOSKY LLP

By: /s/ Thomas J. Fleming

Thomas J. Fleming  
Renee M. Zaytsev  
Park Avenue Tower  
65 East 55<sup>th</sup> Street  
New York, New York 10022  
(212) 451-2300

*Attorneys for GCM Administrative Services, LLC, Strategic Turnaround Equity Parties, L.P. (Cayman), Seth M. Lukash, Gary Herman, and Digital Creative Development Corporation*